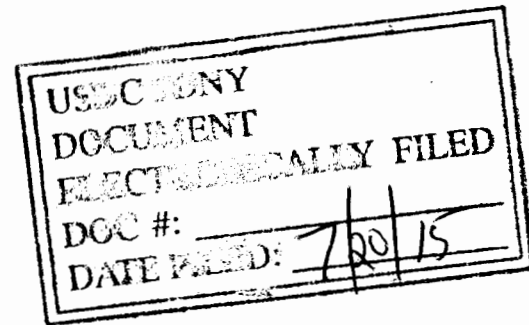


Rakoff J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKIN RE PETROBRAS SECURITIES
LITIGATION

14-cv-9662 (JSR)

~~PROPOSED~~ CIVIL CASE MANAGEMENT PLAN

The Court requires that this case shall be ready for trial on
May 1, 2016.

After consultation with counsel for the parties, the following Case Management Plan is adopted. This plan is also a scheduling order pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure.

- A. The case is to be tried to a jury, subject to defendant Petrobras's, or to the extent applicable any other defendant's, right to a nonjury trial under 28 U.S.C. § 1330(a).
- B. Joinder of additional parties must be accomplished by September 1, 2015.
- C. Amended pleadings may be filed without leave of Court until September 1, 2015. Thereafter, amended pleadings may be filed with leave of Court only upon good cause being shown.
- D. *If there are any amended complaints after today,*
Defendants shall file their answer or move to dismiss 30 days after the filing of any amended complaint pursuant to Item C.
- E. Discovery (in addition to the disclosures required by Fed. R. Civ. P. 26(a)):
 1. Documents. First request for production of documents, if any, must be served by July 24, 2015. Further document requests may be served as required, but no document request may be served later than 30 days prior to the date of the close of discovery as set forth in item 8 below.
 2. Initial Disclosures. Initial disclosures must be served by August 14, 2015.
 3. Interrogatories. Interrogatories pursuant to Rule 33.3(a) of the Local Civil Rules of the Southern District of New York must be served by July 31, 2015. No other interrogatories are permitted except upon prior express permission of Judge Rakoff. No Rule 33.3(a) interrogatories need be served with respect to disclosures automatically required by Fed. R. Civ. P. 26(a).
 4. Experts. Every party-proponent of a claim (including any counterclaim, cross-claim, or third-party claim) that intends to offer expert testimony in respect of such claim must make the disclosures required by Fed. R. Civ. P. 26(a)(2) by February 19, 2016. Every party-opponent of such claim that intends to offer expert testimony in opposition to such claim must make the disclosures required by Fed. R. Civ. P. 26(a)(2) by March 14, 2016. No expert testimony (whether designated as "rebuttal" or otherwise) will be permitted by other experts or beyond the

scope of the opinions covered by the aforesaid disclosures except upon prior express permission of the Court, application for which must be made no later than 10 days after the date specified in the immediately preceding sentence. All experts may be deposed, and such depositions must be completed by March 23, 2016.

5. Depositions. All witness depositions must be completed by April 29, 2016. Unless counsel agree otherwise or the Court so orders, depositions shall not commence until all parties have completed the initial disclosures required by Fed. R. Civ. P. 26(a)(1) or until four weeks from the date of this Order, whichever is earlier. Depositions shall proceed concurrently, with no party having priority, and no deposition shall extend beyond one business day without prior leave of the Court.

6. Document Production. The parties are under an obligation to complete their production of documents as soon as practicable after being served with document requests. The parties shall make all reasonable efforts to substantially complete the production of documents by January 1, 2016 in response to any document requests served by September 1, 2015.

7. Requests to Admit. Requests to Admit, if any, must be served by March 30, 2016.

8. All discovery is to be completed by April 29, 2016. Interim deadlines for items 1-7 above may be extended by the parties on consent without application to the Court, provided the parties are certain they can still meet the discovery completion date set forth in this paragraph. The discovery completion date may be adjourned only upon a showing to the Court of extraordinary circumstances, and may not be extended on consent.

F. Class Certification:

1. Experts. Initial class certification expert reports are due by October 15, 2015; rebuttal expert reports are due by November 6, 2015.

2. Motions. The motion for class certification shall be filed by October 15, 2015; any opposition papers shall be filed by November 6, 2015; and reply papers shall be filed by November 23, 2015. *Oral argument on the motion will be held on December 1, 2015 at 3:30 p.m.*

G. Post-discovery summary judgment motions in the form prescribed by the Court's Individual Rules of Practice may be brought on without further consultation with the Court provided that a Notice of any such motion, in the form specified in the Court's Individual Rules of Practice, is filed no later than March 18, 2016, and provided that the moving papers are served by March 25, 2016, answering papers by April 15, 2016, and reply papers by April 22, 2016. Each party must file its respective papers with the Clerk of the Court on the same date that such papers are served. Additionally, on the same date that any papers are served and filed, counsel filing and serving the papers must arrange to deliver courtesy non-electronic hard copies to the Courthouse for delivery to Chambers.

H. A final pre-trial conference, as well as oral argument on any post-discovery summary judgment motions, shall be held on 4/29/16 at 4pm [date to be inserted by the Court], at which time the Court shall set a firm trial date. The timing and other requirements for the Joint Pretrial Order and/or other pre-trial submissions shall be governed by the Court's Individual Rules of Practice. *The actual trial date shall under no circumstances be later than August 1, 2016.*

I. All motions and applications shall be governed by Judge Rakoff's Individual Rules of Practice. Counsel shall promptly familiarize themselves with all of the Court's Individual Rules, as well as with the Local Rules for the United States District Court for the Southern District of New York.

SO ORDERED.



JED S. RAKOFF
U.S.D.J. *enc*

DATED: New York, New York

7/20/15

ENDORSEMENT ON CMP 14CV9662 (JSR) In re: Petrobras

If there are any amended complaints after today,

Oral argument on the motion will be held December 1, 2015 at 3:30 pm.

The actual trial date shall under no circumstances be later than August 1, 2016.